

SEALED 3:23-mj-00107

DISTRICT OF OREGON, ss: AFFIDAVIT OF BRENDON P. PARENTI

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Brendon P. Parenti, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since March of 2015. I am currently assigned to the FBI's Portland Division and am part of the Transnational Organized Crime and Violent Gang Squad. In 2015, I successfully completed the twenty-one (21) week New Agent's Training course at the FBI Academy in Quantico, Virginia. During that time, I was taught the use and practical application of various investigative techniques employed by federal law enforcement officers. As a federal agent, I am authorized to investigate and enforce violations of the criminal laws set forth in Titles 18 and 21 of the United States Code. My training and experience include participation in large scale investigations as the case agent or supporting investigating agent, resulting in the arrest and prosecution of offenders at the federal level. I have personally participated in or directed many aspects of investigations, including conducting physical surveillance and court-authorized wiretaps, using confidential human sources, analyzing telephone and other records, and writing and executing various types of search and arrest warrants. Through my training, education, and experience, I have become familiar with the manner in which members of a criminal enterprise communicate and use electronic communications to store, transmit, and distribute information to one another and how they plan, organize, and carry out criminal activity.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Shakor Holiday (HOLIDAY), for 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm. As set

forth below, there is probable cause to believe, and I do believe, that HOLIDAY committed 18 U.S.C. § 922(g), Felon in Possession of a Firearm.

Applicable Law

3. 18 U.S.C. § 922(g)(1) prohibits the possession of a firearm by any person who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

Statement of Probable Cause

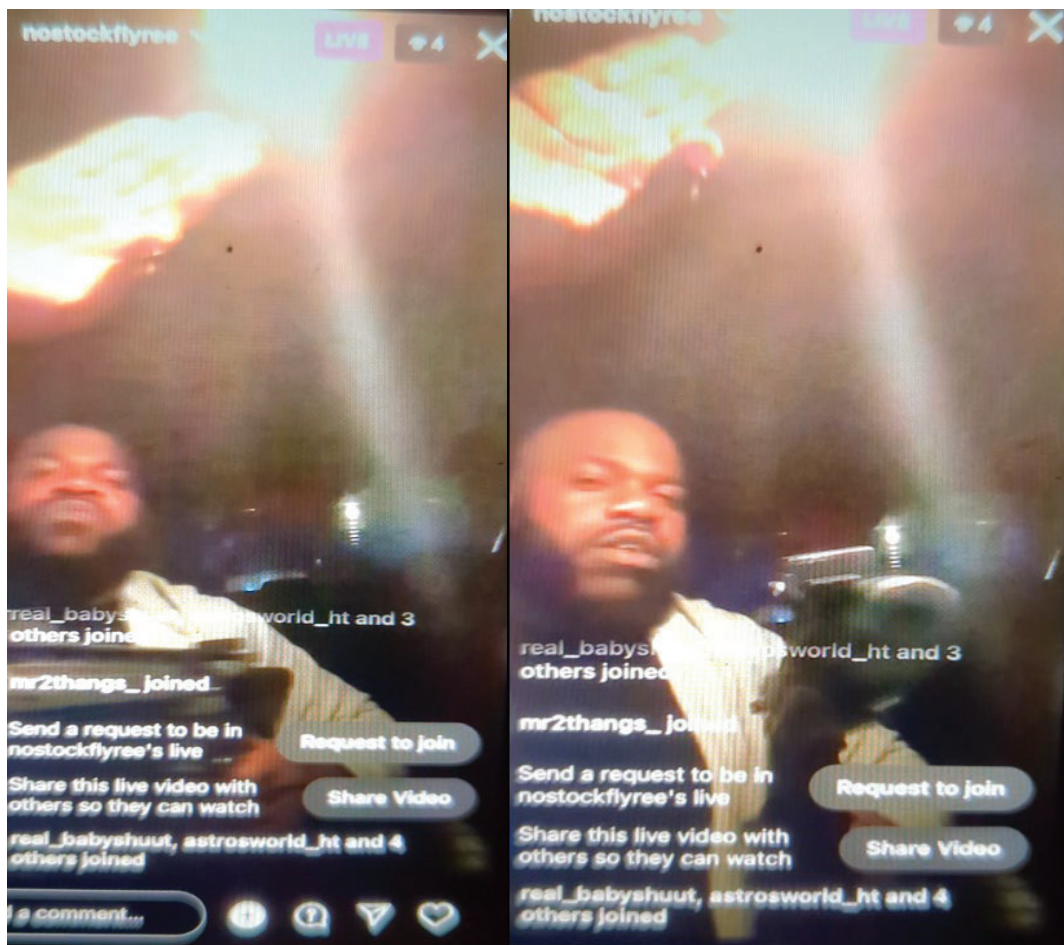
4. Shakor HOLIDAY, aka “Dute Fly” or “Flyree,” is a male, DOB: XX/XX/1994. According to a query of a law enforcement database, HOLIDAY has a felony conviction in Multnomah County, Oregon for Attempted Assault in the First Degree in 2011 (Court Case number 100330994) for which he was sentenced to 621 days incarceration; Unlawful Use of a Weapon in 2013 (Court Case number 120532229), for which he was sentenced to 60 months incarceration; Attempted Assault in the First Degree in 2013 (Court Case number 130230520), for which he was sentenced to 50 months incarceration; and Burglary in the First Degree (Court Case number 17CR08952) for which he was sentenced to 19 months incarceration. HOLIDAY has a felony conviction in the District of Oregon for Felon in Possession of a Firearm in 2020 (Court Case number 3:18-cr-00511-IM) for which he was sentenced to 33-months imprisonment.

5. Based on these convictions, I believe HOLIDAY to be a felon and prohibited from possessing a firearm under federal law.

6. In May 2023, investigators became aware of a social media account believed to be used by HOLIDAY. The account, used the account ID “nostockflyree” with the display name of “Nostockshyt Holiday.” This account was at least partially public and viewable by any Instagram account without being friends. The first post made by the account showed to be on December 7,

2021. The social media account included multiple posts of HOLIDAY with other known Hoover members and associates and “throwing up” Hoover hand signs.

7. On May 31, 2023, a confidential informant captured a video of HOLIDAY using social media account to stream live. During the video clip, HOLIDAY appears to be driving a vehicle and holding an AR style firearm. HOLIDAY can be heard saying “I’m going to jump out on a red light on you N****s,” and saying, “I’m outside.” See still image from video below:



8. Based on my training and experience, and the investigation to date, I believe HOLIDAY to be challenging rivals that he is outside and willing to engage in violence against them. By posting the live video of himself in a vehicle with a firearm, bragging that he was

“outside” and threatening to “jump out on” others, HOLIDAY was showing rivals that he is was out in public and willing to shoot at rivals if he found them.

9. On June 2, 2023, CHS-1 showed investigators that HOLIDAY was the social media account to stream live. Investigators were present with CHS-1 and were able to capture video of HOLIDAY’s live video. During the livestream, HOLIDAY again appeared to be seated in the driver seat of a vehicle and holding an AR style firearm. HOLIDAY was also observed “throwing up” multiple hand signs to include the Hoover “H” hand sign and the “107” hand sign. HOLIDAY could be heard saying “We outside tripping.” See still image from video below:



10. During the live stream, but not captured on video, HOLIDAY stated he was going to go meet up with “Lil’ Lav.” I know “Lil’ Lav” to be the moniker of Hoover member Isaac Burks.

11. On June 22, 2023, investigators executed federal search warrants at HOLIDAY’s residence in Gresham, Oregon. In the kitchen, investigators seized two firearms, a Stoeger STR-9, 9mm handgun and an Anderson Manufacturing AM-15 AR style firearm. I believe the AM-15 AR is the same firearm HOLIDAY posted in his possession on social media. See photograph of the seized AM-14 AR firearm below:



12. I believe both firearms were manufactured outside of the District of Oregon. Therefore, I believe firearms traveled through interstate or foreign commerce.

Conclusion

13. Based on the foregoing, I have probable cause to believe, and I do believe, that HOLIDAY was a Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1). I therefore request that the Court issue a criminal complaint and arrest warrant for HOLIDAY.

14. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Lewis Burkhart,

and AUSA Burkhart advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

15. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By telephone

Brendon P. Parenti, Special Agent
Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

10:33 7a.m/p.m. on June, ²²2023



HON. STACIE F. BECKERMAN
United States Magistrate Judge